

James E. Cecchi  
Lindsey H. Taylor  
Caroline F. Bartlett  
CARELLA, BYRNE, CECCHI  
OLSTEIN, BRODY & AGNELLO  
5 Becker Farm Road  
Roseland, New Jersey 07068  
(973) 994-1700  
*Attorneys for Demand Futile Plaintiffs*

Gary Graifman  
KANTROWITZ, GOLDHAMER &  
GRAIFMAN, P.C.  
210 Summit Avenue  
Montvale, New Jersey 07645  
(201) 391-7000  
*Attorneys for Demand Refused Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE JOHNSON & JOHNSON DERIVATIVE  
LITIGATION

Civil Action No. 10-2033 (FLW)

IN RE JOHNSON & JOHNSON FCPA  
SHAREHOLDER DERIVATIVE LITIGATION

Civil Action No. 11-2511 (FLW)

COPELAND v. PRINCE, *et al.*

Civil Action No. 11-4993 (FLW)

**NOTICE OF MOTION**

To: All Counsel on ECF List

PLEASE TAKE NOTICE that on such date and time as the Court shall direct, the undersigned counsel for Plaintiffs shall move before Hon. Freda L. Wolfson, U.S.D.J. at the Clarkson S. Fisher Federal Building, 402 E. State Street, Trenton, New Jersey 08608 for an Order preliminarily approving the proposed settlement in accordance with Fed. R. Civ. P. 23.1.

The undersigned intends to rely upon the annexed Brief and Exhibits attached thereto.

The undersigned hereby requests oral argument.

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO  
Counsel for Demand Futile Plaintiffs

By: /s/ James E. Cecchi  
JAMES E. CECCHI

Dated: July 11, 2012

Mark Lebovitch  
Jeroen van Kwawegen  
Jeremy Friedman  
BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP  
1285 Avenue of the Americas  
New York, New York 10019  
(212) 554-1400

Darren J. Robbins  
Travis E. Downs III  
David W. Mitchell  
ROBBINS GELLER RUDMAN  
& DOWD LLP  
655 West Broadway, Suite 1900  
San Diego, California 92101  
(619) 231-1058

*Attorneys for Demand Futile Plaintiffs*

Jeffrey S. Abraham  
ABRAHAM, FRUCHTER &  
TWERSKY, LLP  
One Penn Plaza, Suite 2805  
New York, NY 10119  
(212) 279-5050

Gary Graifman  
KANTROWITZ, GOLDHAMER &  
GRAIFMAN, P.C.  
210 Summit Avenue  
Montvale, New Jersey 07645  
(201) 391-7000

*Attorneys for Demand Refused Plaintiffs*